



AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY
TITLE V OPERATING PERMIT

Permit No.: 135-97-TV

Plant ID: 0026

Effective Date: 01/22/2001

Expiration Date: 01/22/2006

UTM Northing: 4225.8

UTM Easting: 609.3

SIC: 2449

NAICS: 32192

AFS: 00026

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

Blue Grass Cooperage Company, Inc.
402 MacLean Avenue
Louisville, KY 40209

in accordance with the permit application on file with the District and under the conditions in the permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Applicant for Permit: Blue Grass Cooperage Co., Inc.

Responsible Official: Larry Mosser

Title of Responsible Official: Director, Production Operations

Date Application Received: 22 April 1997

Revised: 22 September 2000
10 October 2000

Date Application Administratively Complete: 13 June 1997

Date Public Notice Given: 22 October 2000

Reviewing Engineer (5)

Air Pollution Control Officer

Table of Contents

Abbreviations and Acronyms	5
Preamble	6
General Conditions	7
Emission Unit U1 Description: Wood Drying Kilns	14
Applicable Regulations	14
Allowable Emissions	14
Components	14
Control Devices	14
Additional Conditions	14
Standards	14
Monitoring	15
Record Keeping	15
Reporting	15
Emission Unit U2a Description: Barrel and Head Piece Production Operations	17
Applicable Regulations	17
Allowable Emissions	17
Components	17
Control Devices	17
Additional Conditions	18
Standards	18
Monitoring	18
Record Keeping	19
Reporting	19
Emission Unit U2b Description: Barrel and Head Piece Finishing	20
Applicable Regulations	20
Allowable Emissions	20
Components	20
Control Devices	20
Additional Conditions	20
Standards	20
Monitoring	21
Record Keeping	21
Reporting	22
Emission Unit U3a Description: Barrel Charring Operations	25
Applicable Regulations	25
Allowable Emissions	25
Components	25
Control Devices	25
Additional Conditions	25

Standards	25
Monitoring	26
Record Keeping	27
Reporting	27
Emission Unit U3b Description: Head Char/Toasting Operations	29
Applicable Regulations	29
Allowable Emissions	29
Components	29
Control Devices	29
Additional Conditions	29
Standards	29
Monitoring	30
Record Keeping	30
Reporting	31
Emission Unit U4 Description: Glue Application and Operations	32
Applicable Regulations	32
Allowable Emissions	32
Components	32
Control Devices	32
Additional Conditions	32
Monitoring	33
Record Keeping	33
Reporting	34
Emission Unit U5a Description: Wood-fired Boiler	35
Applicable Regulations	35
Allowable Emissions	35
Components	35
Control Devices	35
Additional Conditions	35
Standards	35
Monitoring	36
Record Keeping	37
Reporting	37
Emission Unit U5b Description: Sawdust Handling System	40
Applicable Regulations	40
Allowable Emissions	40
Components	40
Control Devices	40
Additional Conditions	40
Standards	40
Monitoring	41
Record Keeping	41
Reporting	42

Emission Unit U5c Description: Gas-fired only boiler	44
Applicable Regulations	44
Allowable Emissions	44
Components	44
Control Devices	44
Additional Conditions	44
Standards	44
Monitoring	45
Record Keeping	45
Reporting	46
Emission Unit U6 Description: VYCAR Barrel Coating	47
Applicable Regulations	47
Allowable Emissions	47
Components	47
Control Devices	47
Additional Conditions	47
Standards	47
Monitoring	48
Record Keeping	48
Reporting	48
Emission Unit U7 Description: Cold Solvent Parts Cleaner	49
Applicable Regulations	49
Allowable Emissions	49
Control Devices	49
Additional Conditions	49
Standards	49
Monitoring	50
Record Keeping	50
Reporting	51
Permit Shield	52
Alternative Operating Scenarios	52
Off-Permit Documents	52
Source-Wide HAP Speciation	52
Insignificant Activities	52

Abbreviations and Acronyms

AC	- Additional Condition
AFS	- Airs Facility Subsystem

AIRS	- Aerometric Information Retrieval System
APCD	- Air Pollution Control District
ASL	- Adjusted Significant Level
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British Thermal Unit
°C	- Degrees Centigrade
CEMS	- Continuous Emission Monitoring System
CAAA	- Clean Air Act Amendments (15 November 1990)
cf	- Cubic foot
DOE	- District Only Enforceable
°F	- Degrees Fahrenheit
gal	- Gallon
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- hour
lbs	- Pounds
l	- Liter
MACT	- Maximum Achievable Control Technology
m	- Meter
mg	- Milligram
mm	- Millimeter
MM	- Million
MOCS	- Management of Change System
NAICS	- North American Industry Classification System
NSR	- New Source Review
NO _x	- Nitrogen oxides
NSPS	- New Source Performance Standards
PM	- Particulate Matter
PM ₁₀	- Particulate matter less than 10 microns
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
PMP	- Preventive Maintenance Plan
psia	- Pounds per square inch absolute
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
TAL	- Threshold Ambient Limit
TAP	- Toxic Air Pollutant
tpy	- Tons per year
VOC	- Volatile Organic Compound

Preamble

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable

regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.

General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

***US EPA - Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960***
3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
 - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
 - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.
5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
 - ii. The permitted facility was at the time being properly operated.
 - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
 - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.

(Regulation 2.16, sections 4.7.1 through 4.7.4)

6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)
7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)
9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.
11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)
12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)
13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:
 - a. Enter the premises to inspect any emissions-related activity or records required in this permit.
 - b. Have access to and copy records required by this permit.
 - c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
 - d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.
(Regulation 2.16, section 4.3.2)
14. **Monitoring and Related Record keeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be

postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:

- a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
 - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
 - c. Knowingly making any false statement in any permit application.
 - d. Noncompliance with Regulation 1.07, section 4.2; or
 - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)
33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.
35. **Submittal of Reports, Data, Notifications, and Applications**

- a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

***Air Pollution Control District of Jefferson County
850 Barret Ave
Louisville, KY 40204-1745***

- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

***US EPA - Region IV
APTMD - 12th floor
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104***

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emission Standards and Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions
6.01	General Provisions (for <i>Existing Affected Facilities</i>)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for <i>New Affected Facilities</i>)

DISTRICT ONLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees
8.03	Commuter Vehicle Testing Requirements

Emission Unit U1 Description: Wood Drying Kilns**Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1, 2, 3 and 5

Allowable Emissions:

Regulated Air Pollutant	Limit/Standard
PM	81.7 lbs/hr (Regulation 7.08, Section 3)
Opacity	< 20% (Regulation 7.08, Section 3)

Components:

Emission Pt	Description	Control ID
E1	Wood Drying Kiln Operation (8 kilns total) Three (3) kilns installed in 1979 Five (5) kilns installed in 1981	Uncontrolled

Control Devices: There are no control devices associated with this emission unit.

Additional Conditions1. **Standards** (Regulation 2.16, section 4.1.1)

a. PM (Regulation 7.08, Section 3)

The owner or operator shall not cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 in Regulation 7.08. (Section 3.3)

b. Opacity

No person shall cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (Section 3.2)

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. PM

i. The owner or operator shall monitor the following for each operating day:

- 1) The number of batches and total board feet of wood processed in each drying kiln; and
- 2) The total operating hours of each drying kiln.

ii. Additional compliance monitoring shall consist of the record keeping requirement specified in AC # 3.a.

b. Opacity

No periodic monitoring for opacity is required.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. PM

The owner or operator shall maintain daily records of the following information:

- i. The number of batches of wood dried or processed in each drying kiln for each operating day;
- ii. Total number of board feet in each batch; and
- iii. The number of operating hours for each kiln for each operating day.

b. Opacity

There are no record keeping requirements for opacity.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. PM

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of all periods of exceedances of the hourly PM emission limit including the quantity of excess emissions;
- iv. Reason for excess emissions whether process upset, control device, malfunction, other known causes, or unknown causes; and
- v. Description of any corrective action taken.

b. Opacity

There are no compliance reporting requirements for opacity.

Emission Unit U2a Description: Barrel and Head Piece Production Operations**Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.09	Standards of Performance for Existing Process Operations	1, 2, 3, and 5

Allowable Emissions:

Regulated Air Pollutant	Limit/Standard
PM	2.58 lbs/hr (each Emission Point); (Regulation 6.09, Section 3)
Opacity	< 20% (Regulation 6.09, section 3.1.1)

Components:

Emission Pt	Description	Control ID
E3	Stave / Jointing Molder, installed in 1969	C-7
E4	Stave Jointing, installed in 1969	C-8
E6	Scrap Hog for wood shredding, installed in 1969	C-10
E7	Sawdust Storage Tank (40 ft), installed in 1969	Uncontrolled

Control Devices:

ID	Stack ID	Description	Performance Indicator	Range	Monitoring & Frequency	Reporting Frequency
C -7	S-2	South Baghouse	Pressure Drop	1- 6 “ H ₂ O	Recordkeeping Daily	Semi-annual
C-8	S-3	Middle Baghouse	Pressure Drop	1- 6 “ H ₂ O	Recordkeeping Daily	Semi-annual
C-10	S-5	Baghouse	Pressure Drop	1- 6 “ H ₂ O	Recordkeeping Daily	Semi-annual

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)

a. PM (Regulation 6.09, Section 3)

The owner or operator shall not cause, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 in Regulation 6.09. (section 3.4)

b. Opacity

The owner or operator shall not cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (section 3.3)

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. PM

- i. The owner or operator shall monitor and record the pressure drop across control devices C-7, C-8, and C-10 once each operating day.
- ii. Additional compliance monitoring shall consist of the record keeping requirement specified in AC # 3.a.

b. Opacity

- i. For each PM emission point, the owner or operator shall conduct a weekly one (1) minute visible emission survey during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.
- ii. For each PM emission point without observed visible emissions during twelve (12) consecutive operating weeks, the owner or operator may elect to conduct a monthly visible emissions survey.
- iii. At each PM emission point, where visible emissions are observed, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 for stack emissions or Method 22 fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance. Any Method 9 or Method 22 tests performed shall meet the requirements of 40 CFR Part 60, Appendix A. Subsequent visible emission surveys shall be conducted as specified in 2.b.i.
- iv. If an emission point is not being operated during the observation period, then no visible emission survey needs to be performed and a negative declaration may be entered in the

record. The owner or operator shall maintain sufficient records to verify the emission point was not being operated.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. PM

The owner or operator shall maintain daily records of the following information:

- i. The production rate for each operating day;
- ii. The number of operating hours for each operating day;
- iii. The hourly PM emissions;
- iv. Identification of all periods when control device C-7, C-8 or C-10 was not operating or bypassing occurred; and
- v. The pressure drop readings required by AC # 2.a.i.

b. Opacity

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from 2. b. iii. above shall be documented and records made available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. PM

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of all periods of exceedances of the hourly PM emission limit including the quantity of excess emissions;
- iv. Reason for excess emissions whether process upset, control device, malfunction, other known causes, or unknown causes; and
- v. Description of any corrective action taken.

b. Opacity

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number and Stack ID number;
- ii. The beginning and ending date of the reporting period;
- iii. The date, time and results of each visible emissions survey conducted

that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;

- iv. The date, time and results of each Method 9 or Method 22 conducted. If no Method 9 or Method 22 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
 - v. Description of any corrective action taken pursuant to AC # 2.b.iii.
- c. Control Devices C-7, C-8 and C-10

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for each control device:

- i. Emission Unit ID number and Control ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of the operating parameter being monitored to demonstrate ongoing compliance;
- iv. identification of all periods of control device bypassing or downtime;
- v. Summary information on the number, duration and cause of all excursions. (Excursion is defined as any departure from the performance indicator range); and
- vi. Description of the corrective action taken for each excursion.

Emission Unit U2b Description: Barrel and Head Piece Finishing Operations**Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.09	Standards of Performance for Existing Process Operations	1, 2, 3 and 5

Allowable Emissions:

Regulated Air Pollutant	Limit/Standard
PM	2.58 lbs/hr (Regulation 6.09, section 3.4)
Opacity	< 20% (Regulation 6.09, section 3.3.1)

Components:

Emission Pt	Description	Control ID
E2	Equalizer/Planer for wood staves, installed 1969	C-6
E5	Planer/Jointer for wooden pieces, installed 1969	C-9

Control Devices:

ID	Stack ID	Description	Performance Indicator	Range	Monitoring & Frequency	Reporting Frequency
C-6	S-1	East Baghouse	Pressure Drop	1-6" H ₂ O	Recordkeeping Daily	Semi-annual
C-9	S-4	North Baghouse	Pressure Drop	1-6" H ₂ O	Recordkeeping Daily	Semi-annual

Additional Conditions1. **Standards** (Regulation 2.16, section 4.1.1)

a. PM (Regulation 6.09, Section 3)

The owner or operator shall not cause, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 in Regulation 6.09. (Section 3.4)

b. Opacity

The owner or operator shall not cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (Section 3.3)

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. PM

- i. The owner or operator shall monitor and record the pressure drop across control devices C-6 and C-9 once each operating day.
- ii. Additional compliance monitoring shall consist of the record keeping requirement specified in AC # 3.a.

b. Opacity

- i. For each PM emission point, the owner or operator shall conduct a weekly one (1) minute visible emission survey during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.
- ii. For each PM emission point without observed visible emissions during twelve (12) consecutive operating weeks, the owner or operator may elect to conduct a monthly visible emissions survey.
- iii. At each PM emission point, where visible emissions are observed, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 for stack emissions or Method 22 fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance. Any Method 9 or Method 22 tests performed shall meet the requirements of 40 CFR Part 60, Appendix A. Subsequent visible emission surveys shall be conducted as specified in 2.b.i.
- iv. If an emission point is not being operated during the observation period, then no visible emission survey needs to be performed and a negative declaration may be entered in the record. The owner or operator shall maintain sufficient records to verify the emission point was not being operated.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. PM

The owner or operator shall maintain daily records of the following information:

- i. The production rate for each operating day;
- ii. The number of operating hours for each operating day;
- iii. The hourly PM emissions;

- iv. Identification of all periods when control device C-6 or C-9 was not operating or bypassing occurred; and
- v. The results of the pressure drop readings required by AC # 2.a.i.

b. Opacity

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from 2. b. iii. above shall be documented and records made available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. PM

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of all periods of exceedances of the hourly PM emission limit including the quantity of excess emissions;
- iv. Reason for excess emissions whether process upset, control device, malfunction, other known causes, or unknown causes; and
- v. Description of any corrective action taken.

b. Opacity

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number and Stack ID number;
- ii. The beginning and ending date of the reporting period;
- iii. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;
- iv. The date, time and results of each Method 9 or Method 22 conducted. If no Method 9 or Method 22 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
- v. Description of any corrective action taken pursuant to AC # 2.b.iii.

c. Control Devices

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for each control device:

- i. Emission Unit ID number and Control ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of the operating parameter being monitored to demonstrate ongoing compliance;
- iv. Identification of all periods of control device bypassing or downtime;
- v. Summary information on the number, duration and cause of all excursions. (Excursion is defined as any departure from the performance indicator range); and
- vi. Description of the corrective action taken for each excursion.

Emission Unit U3a Description: Barrel Charring Operations**Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.09	Standards of Performance for Existing Process Operations	1, 2, 3, 4 and 5

Allowable Emissions:

Regulated Air Pollutant	Limit/Standard
PM	21.5 lbs/hr (Regulation 6.09, Section 3)
Opacity	< 20% (Regulation 6.09, Section 3)
NO _x	300 ppmv or invisible discharge (Regulation 6.09, Section 4)

Components:

Emission Pt	Description	Control ID
E8	Barrel Charring Operations, installed in 1958	C1-C3

Control Devices:

ID	Stack ID	Description	Performance Indicator	Range	Monitoring & Frequency	Reporting Frequency
C1-C3	S-7	Three stage wet scrubber	N/A	N/A	None See AC# 2.a.i.	Semi-annual

Additional Conditions1. **Standards** (Regulation 2.16, section 4.1.1)

a. PM (Regulation 6.09, Section 3)

For emissions from a control device or stack, no person shall cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 in Regulation 6.09. (Section 3.4)

b. Opacity

The owner or operator shall not cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (section 3.3)

c. Nitrogen Oxides

For emissions from a control device or stack, no person shall cause, suffer, allow or permit the emission into the open air any Nitrogen Oxide fumes from any affected facility that is in excess of the quantity specified in this permit as determined from Regulation 6.09, Section 4.1.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. PM

- i. The potential uncontrolled mass PM emission rate is below the regulatory allowable emission limit; therefore, no parametric monitoring of the 3-stage wet scrubber is required.

b. Opacity

- i. The owner or operator shall comply with the following requirements:

- 1) The owner or operator shall conduct a daily Method 9 visible emissions test during normal operation and daylight hours; or
- 2) If after ten (10) consecutive operating days of daily Method 9 evaluations, with no exceedance of opacity limit, the owner or operator may elect to conduct daily one minute visible emissions surveys.
- 3) If, at any time, visible emissions are observed, the owner or operator shall initiate corrective action within eight (8) hours of the initial observation. If visible emissions persist, the owner or operator shall, within 24 hours, perform a Method 9 test. If the opacity is exceeding the standard, the owner or operator shall notify the District and take all practical steps to eliminate the exceedance. Subsequent visible emissions surveys shall be performed according to AC # 2.b.i.1.
- 4) If the emission unit is not being operated during the observation period, then no visible emission survey needs to be performed and a negative declaration may be entered in the record. The owner or operator shall maintain sufficient records to verify the emission unit was not being operated.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. PM

The owner or operator shall maintain daily records of the following information:

- i. The number of barrels processed/charred for each operating day; and

ii. The number of operating hours for each operating day;

b. Opacity

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from AC #2.b.i.3) above shall be documented and records made available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. PM

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Reason for any excess emissions whether process upset, control device, malfunction, other known causes, or unknown causes; and
- iv. Description of any corrective action taken.

b. Opacity

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number and Stack ID number;
- ii. The beginning and ending date of the reporting period;
- iii. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;
- iv. The date, time and results of each Method 9 conducted. If no Method 9 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
- v. Description of any corrective action taken pursuant to AC # 2.b.i.3).

c. Control Device

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for the 3-stage wet scrubber:

- i. Emission Unit ID and Control ID numbers;
- ii. The beginning and ending date of the reporting period; and
- iii. Identification of all periods of control device bypassing or downtime.

Emission Unit U3b Description: Head Char/Toasting Operations**Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.09	Standards of Performance for Existing Process Operations	1, 2, 3, 4 and 5

Allowable Emissions:

Regulated Air Pollutant	Limit/Standard
PM	7.05 lbs/hr (Regulation 6.09, Section 3)
Opacity	< 20% (Regulation 6.09, Section 3)
NO _x	300 ppmv or invisible discharge (Regulation 6.09, Section 4)

Components:

Emission Pt	Description	Control ID
E9	Head Charring Operations, installed in 1955	Uncontrolled

Control Devices: There are no control devices associated with the head charring operations.

Additional Conditions1. **Standards** (Regulation 2.16, section 4.1.1)

a. PM (Regulation 6.09, Section 3)

The owner or operator shall not cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 in Regulation 6.09. (Section 3.4)

b. Opacity

No person shall cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (Section 3.3)

c. NO_x

For emissions from a control device or stack, no person shall cause, suffer, allow or permit the emission into the open air any nitrogen oxide fumes from any affected facility that is in excess of the quantity specified in this permit as determined from Regulation 6.09, section 4.1.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. PM

Compliance monitoring shall consist of the record keeping requirement specified in AC # 3.a.

b. Opacity

- i. For each PM emission point, the owner or operator shall conduct a weekly (1) minute visible emission survey during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously. After 12 consecutive operating weeks with no observed visible emissions, the owner or operator may conduct monthly one (1) minute visible emissions surveys.
- ii. At each PM emission point, where visible emissions are observed, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 for stack emissions or Method 22 fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance. Any Method 9 or Method 22 tests performed shall meet the requirements of 40 CFR Part 60, Appendix A. Subsequent visible emission surveys shall be conducted as specified in 2.b.i.
- iii. If an emission point is not being operated during the observation period, then no visible emission survey needs to be performed and a negative declaration may be entered in the record. The owner or operator shall maintain sufficient records to verify the emission point was not being operated.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. PM

The owner or operator shall maintain daily records of the following information:

- i. The number of barrel heads processed/charred for each operating day;
- ii. The number of operating hours for each operating day; and
- iii. The hourly PM emissions.

b. Opacity

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from 2. b. ii. above shall be documented and records made available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. PM

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for Regulation 6.09:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of all periods of exceedances of the hourly PM emission limit including the quantity of excess emissions;
- iv. Reason for excess emissions whether process upset, control device, malfunction, other known causes, or unknown causes; and
- v. Description of any corrective action taken.

b. Opacity

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number and Stack ID number;
- ii. The beginning and ending date of the reporting period; and
- iii. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;
- iv. The date, time and results of each Method 9 or Method 22 conducted. If no Method 9 or Method 22 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
- v. Description of any corrective action taken pursuant to AC # 2.b.ii.

Emission Unit U4 Description: Glue Application and Operations**Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.24	Standards of Performance for Existing Sources Using Organic Materials	1, 2, 3, 4, 5, and 7

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

Allowable Emissions:

Regulated Air Pollutant	Limit/Standard
VOC	See AC # 1.a.
TAPs	See AC # 1.b

Components:

Emission Pt	Description	Control ID
E10	Wood Glue Operations (Clamp Carrier), installed in 1980	Uncontrolled
E11	Glue Applicator, installed in 1980	

Control Devices: There are no control devices associated with this emission unit.

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. VOC (Regulation 6.24, Section 3)
 - i. No owner or operator subject to this regulation shall discharge into the atmosphere more than 15 pounds of organic materials in any one day, or more than three pounds in any one hour, from any existing affected facility in which any Class I solvent is used unless said discharge has been reduced by at least 85% by weight. (section 3.1)

- ii. No owner or operator subject to this regulation shall discharge into the atmosphere more than 40 pounds of organic materials in any one day, nor more than eight pounds in any one hour, from any existing affected facility in which any Class II solvent is used unless said discharge has been reduced by at least 85% by weight. (section 3.2)
- iii. No owner or operator subject to this regulation shall discharge into the atmosphere more than 3,000 pounds of organic materials in any one day, nor more than 450 pounds in any one hour, from any existing affected facility in which any Class III solvent or any material containing such solvent is employed or applied unless the discharge has been reduced by at least 85% by weight. (section 3.3)

b. TAPs

The owner or operator shall not allow or cause the emissions of TAPs to exceed the ASL value, unless modeling or a RACT analysis has been submitted and approved by the District. The owner or operator shall evaluate and document process changes to demonstrate that the emission levels established during the initial compliance demonstration are not exceeded. If there is an increase in emission levels, the owner or operator shall demonstrate that emissions do not exceed the ASL, based on potential to emit (PTE).

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. VOC/TAP

- i. The owner or operator shall monitor the following on a monthly basis:
 - 1) The quantity of glue used; and
 - 2) The weight percent of each VOC and TAP component in the glue.

3. **Recordkeeping** (Regulation 2.16, section 4.1.9.2)

a. VOC/TAP

- i. The owner or operator shall maintain daily records of the following:
 - 1) The quantity of glue used or applied; and
 - 2) The weight percent of each VOC and TAP component in the glue; and

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. VOC

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for VOC:
 - 1) Emission Unit ID number;
 - 2) The beginning and ending date of the reporting period; and

- 3). Identification of all periods of exceedances of the hourly and daily VOC emission limit including the quantity of excess emissions;
- 4) Reason for excess emissions whether process upset, control device malfunction, other known causes, or unknown causes; and
- 5). Description of any corrective action taken.

b. TAPs

Semi-annual compliance monitoring reports for TAPs are not required for this emission unit.

Emission Unit U5a Description: Wood-fired Boiler**Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.07	Standards of Performance for Existing Indirect Heat Exchangers	1, 2, 3 and 4

Allowable Emissions:

Regulated Air Pollutant	Limit/Standard
SO ₂	2.34 lbs/MMBtu Heat Input (Reg 6.07, section 4.1) (sawdust classified as a solid fuel to determine the limits)
PM	0.40 lbs/MMBtu Heat Input (Reg 6.07, section 3.1)
Opacity	< 20% (Reg 6.07, section 3.2)

Components:

Emission Pt	Description	Control ID
E12	Wood-fired Boiler rated at 42 MMBtu/hr installed in 1967 (combusting sawdust to produce steam)	C-11

Control Devices:

ID	Stack ID	Description	Performance Indicator	Range	Monitoring & Frequency	Reporting Frequency
C-11	S-12	Wet Scrubber	Pressure Drop	2-6 " H ₂ O	Recordkeeping Daily	Semi-annual

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. PM (Regulation 6.07, Section 3)

The owner or operator shall not cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of 0.40 lbs per MMBtu heat input as determined using Table 1 in Regulation 6.07. (Section 3.1)

b. Opacity

The owner or operator shall not cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (Regulation 6.07, section 3.2)

c. SO₂

The owner or operator shall not cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess 2.34 lbs/MMBtu heat input as determined using Table 2 in Regulation 6.07. (section 4.1)

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. PM

- i. The owner or operator shall monitor and record the pressure drop across the wet scrubber (C-11) once each operating day.
- ii. Additional compliance monitoring shall consist of the record keeping requirement specified in AC # 3.a.

b. Opacity

- i. The owner or operator shall comply with the following opacity monitoring requirements:
 - 1) The owner or operator shall conduct a daily Method 9 visible emissions test; or
 - 2) If after ten (10) consecutive operating days of daily Method 9 evaluations, with no exceedance of opacity limit, the owner or operator may elect to conduct weekly one minute visible emissions surveys.
 - 3) If, at any time, visible emissions are observed from E-12, the owner or operator shall initiate corrective action within eight (8) hours of the initial observation. If visible emissions persist, the owner or operator shall, within 24 hours, perform a Method 9 test. If the opacity is exceeding the standard, the owner or operator shall notify the District and take all practical steps to eliminate the exceedance. Subsequent visible emissions surveys shall be performed according to AC # 2.b.i.1.
 - 4) If the emission unit is not being operated during the observation period, then no visible emission survey needs to be performed and a negative declaration may be entered in the record. The owner or operator shall maintain sufficient records to verify the emission was not being operated.

c. SO₂

Compliance monitoring shall consist of the record keeping requirement specified in AC # 3.c.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. PM

The owner or operator shall maintain daily records of the following information for each operating day:

- i. The total pounds of steam generated, which has an average hourly conversion ratio of 1.0 pound of sawdust burned per 5.0 pounds of steam generated;
- ii. The number of operating hours;
- iii. Identification of all periods when control device C-11 was not operating or bypassing occurred; and
- v. The results of the pressure drop readings required by AC # 2.a.i.

b. Opacity

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from AC # 2.b.i.3) above shall be documented and records made available to the District upon request.

c. SO₂

The owner or operator shall maintain daily records of the following information:

- i. The total pounds of wood waste burned for each operating day;
- ii. The number of operating hours for each operating day; and
- iii. The weight percent of sulfur contained in the sawdust / wood used as a fuel;

4. **Reporting** (Regulation 2.16, Section 4.1.9.3)

a. PM

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of all periods of exceedances of the PM emission standard including the quantity of excess emissions;
- iv. Reason for excess emissions whether process upset, control device, malfunction, other known causes, or unknown causes; and
- v. Description of any corrective action taken.

b. Opacity

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit and Stack ID numbers;
- ii. The beginning and ending date of the reporting period;
- iii. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;
- iv. The date, time and results of each Method 9 test. If no Method 9 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
- v. Description of any corrective action taken pursuant to AC # 2.b.i.3).

c. SO₂

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for SO₂:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of all periods of exceedances of the SO₂ emission standard including the quantity of excess emissions;
- iv. Reason for excess emissions whether process upset, control device, malfunction, other known causes, or unknown causes; and
- v. Description of any corrective action taken.

d. Control Device C-11

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for control device C-11:

- i. Emission Unit ID number and Control ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of the operating parameter being monitored to demonstrate ongoing compliance;
- iv. Identification of all periods of control device bypassing or downtime;
- v. Summary information on the number, duration and cause of all excursions. (Excursion is defined as any departure from the performance indicator range); and
- vi. Description of the corrective action taken for each excursion.

Emission Unit U5b Description: Sawdust Handling System**Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.09	Standards of Performance for Existing Process Operations	1, 2, 3, and 5

Allowable Emissions:

Regulated Air Pollutant	Limit/Standard
PM	5.7 lbs/hr (Regulation 6.09, section 3.4)
Opacity	< 20% Opacity (Regulation 6.09, section 3.3)

Components:

Emission Pt	Description	Control ID
E-13	Sawdust storage tank, Screw conveyor, cyclone	C-5

Control Devices:

ID	Stack ID	Description	Performance Indicator	Range	Monitoring & Frequency	Reporting Frequency
C-13	S-6	Fabric Filter	Pressure Drop	1-6" H ₂ O	Daily Record Keeping	Semi-annual

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. PM (Regulation 6.09, Section 3)
 - i. For emissions from a control device or stack, no person shall cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 in Regulation 6.09. (section 3.4)
 - b. Opacity

- i. No person shall cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (section 3.3)

2. **Monitoring** (Regulation 2.16, Section 4.1.9.1.2)

a. PM

- i. The owner or operator shall monitor the pressure drop across baghouse C-13 once each operating day.
- ii. Additional compliance monitoring shall consist of the record keeping requirement specified in AC # 3.a.

b. Opacity

- i. For each PM emission point, the owner or operator shall conduct a weekly one (1) minute visible emission survey during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.
- ii. For each PM emission point without observed visible emissions during twelve (12) consecutive operating weeks, the owner or operator may elect to conduct a monthly one minute visible emissions survey.
- iii. At each PM emission point, where visible emissions are observed, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 for stack emissions or Method 22 fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance. Any Method 9 or Method 22 tests performed shall meet the requirements of 40 CFR Part 60, Appendix A. Subsequent visible emission surveys shall be conducted as specified in 2.b.i.
- iv. If an emission point is not being operated during the observation period, then no visible emission survey needs to be performed and a negative declaration may be entered in the record. The owner or operator shall maintain sufficient records to verify the emission point was not being operated.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. PM

The owner or operator shall maintain daily records of the following information:

- i. The pounds or quantity of sawdust processed for each operating day;
- ii. The number of operating hours for each operating day;

- iii. The hourly PM emissions;
- iv. Identification of all periods when control device C-13 was not operating or bypassing occurred; and
- v. The results of the pressure drop readings required by AC # 2.a.i.

b. Opacity

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from 2. b. iii. above shall be documented and records made available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. PM

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of all periods of exceedances of the hourly PM emission limit including the quantity of excess emissions;
- iv. Reason for excess emissions whether process upset, control device, malfunction, other known causes, or unknown causes; and
- v. Description of any corrective action taken.

b. Opacity

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number and Stack ID number;
- ii. The beginning and ending date of the reporting period;
- iii. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;
- iv. The date, time and results of each Method 9 or Method 22 conducted. If no Method 9 or Method 22 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
- v. Description of any corrective action taken pursuant to AC # 2.b.iii.

c. Control Device C-13

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for control device C-13:

- i. Emission Unit ID number and Control ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of the operating parameter being monitored to demonstrate ongoing compliance;
- iv. Identification of all periods of control device bypassing or downtime;
- v. Summary information on the number, duration and cause of all excursions. (Excursion is defined as any departure from the performance indicator range); and
- vi. Description of the corrective action taken for each excursion.

Emission Unit U5c Description: Gas-fired only boiler for auxiliary production of process steam

Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.06	Standards of Performance for New Indirect Heat Exchangers	1, 2, 3, 4, 5, 6 and 7
40 CFR 60 Subpart D _C	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	60.40c, 60.41c, and 60.48c (a)

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.02	Federal New Source Performance Standards Incorporated by Reference	1.10

Allowable Emissions:

Regulated Air Pollutant	Limit/Standard
PM	0.33 lbs/MMBtu per hr; 1.14 lbs/hr and 5 tpy
Opacity	< 20%, Regulation (Regulation 7.06, Section 4.2)
SO ₂	1.0 lb/MMBtu per hr; 1.14 lbs/hr and 5 tpy

Components:

Emission Pt	Description	Control ID
E-14	Gas-fired boiler rated at 27 MM Btu/hr (600 Hp) installed 1999	Uncontrolled

Control Devices: There are no control devices associated with this emission unit.

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. PM
 - i. The owner or operator shall not cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of 0.33 lbs/MMBtu/hr. (Regulation 7.06, section 4.1.4)
 - b. Opacity

- i. The owner or operator shall not cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity.
(Regulation 7.06, section 4.2)
 - c. SO₂
 - i. The owner or operator shall not cause, suffer, allow or permit the emission into the open air of sulfur dioxide material from any affected facility that is in excess of 1.0 lb/MMBtu/hr. (Regulation 7.06, section 5.1.1)
- 2. **Monitoring** (Regulation 2.16, Section 4.1.9.1.2)
 - a. PM/SO₂
 - i. The potential uncontrolled PM and SO₂ emissions are below the emission standards specified in this permit using AP-42 emission factors; therefore, no ongoing compliance monitoring is required except for monthly fuel usage.
 - b. Opacity
 - i. The owner or operator shall conduct monthly one (1) minute visible emission surveys during normal operation and daylight hours.
 - ii. If, at any time, visible emissions are observed, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance. Any Method 9 tests performed shall meet the requirements of 40 CFR Part 60, Appendix A.
 - iii. If an emission point is not being operated during the observation period, then no visible emission survey needs to be performed and a negative declaration may be entered in the record. The owner or operator shall maintain sufficient records to verify the emission point was not being operated.
- 3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
 - a. PM/SO₂

The owner or operator shall maintain daily records of the following information:

 - i. The quantity of natural gas burned each operating day; and
 - ii. The number of operating hours for each operating day.
 - b. Opacity

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from 2. b. ii. above shall be documented and records made available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. PM/SO₂

The potential uncontrolled emissions of PM and SO₂ do not exceed the allowable emission limit; therefore, no compliance monitoring reports are required.

b. Opacity

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;
- iv. The date, time and results of each Method 9. If no Method 9 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
- v. Description of any corrective action taken pursuant to AC # 2.b.ii.

Emission Unit U6 Description: VYCAR Barrel Coating and Sealing Operations**Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4 and 5

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

Allowable Emissions:

Regulated Air Pollutant	Limit/Standard
VOC	< 5 TPY (Regulation 7.25, Section 3)
TAPs	See AC # 1.b

Components:

Emission Pt	Description	Control ID
E-15	Vycar barrel coating and sealing operations, installed in 1993	Uncontrolled

Control Devices: There are no control devices associated with this emission unit.

Additional Conditions1. **Standards** (Regulation 2.16, section 4.1.1)

a. VOC (Regulation 7.25, section 3)

The owner or operator shall not allow or cause the annual VOC emissions to equal or exceed 5 tons.

b. TAPs

The owner or operator shall not allow or cause the emissions of TAPs to exceed the ASL value, unless modeling or a BACT analysis has been submitted and approved by the District. Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request. If there is an increase in emission levels, the owner or operator shall demonstrate that emissions do not exceed the adjusted significant level (ASL), based on potential to emit (PTE).

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. VOC and TAP

- i. The owner or operator shall monitor and record the monthly usage of latex sealcoat.
- ii. Additional compliance monitoring shall consist of the record keeping requirement specified in AC # 3.a.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. VOC and TAP

- i. The owner or operator shall maintain monthly records of the following information:
 - 1) Quantity of latex sealcoat used;
 - 2) The weight percent of each VOC and TAP in the latex sealcoat;
 - 3) The number of operating hours for each operating day; and
 - 4) The total VOC emisisions for each calendar month.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. VOC

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for VOC:
 - 1) Emission Unit ID number;
 - 2) The beginning and ending date of the reporting period; and
 - 3) The twelve consecutive month VOC emissions for each month of the reporting period.

b. TAPs

Semi-annual compliance monitoring reports are not required for TAPs for this emission unit.

Emission Unit U7 Description: Cold Solvent Parts Cleaner (Non-Halogenated)**Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.18	Standards of Performance for New Solvent Metal Cleaning Equipment	1, 2, 3, 4.1, 4.2, 4.3 and 4.4

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5 and 6
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

Allowable Emissions:

Regulated Air Pollutant	Standard/Limit
VOC	See AC # 1.a.
TAPs	See AC # 1.b.

Emission Pt	Description	Control ID
E-16	45 gallon parts washer w/ secondary reservoir	Uncontrolled

Control Devices: There are no add-on control devices associated with this emission unit.

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. VOC (Regulation 7.18, Section 3 & 4)
 - i. Control equipment
 - 1) The cleaner shall be equipped with a cover.
 - 2) The cleaner shall be equipped with a drainage facility such that VOC that drains off parts removed from the cleaner will return to the cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system.

- 3) A permanent, conspicuous label summarizing the operating requirements in AC # 1.ii. shall be installed on or near the cleaner.
- 4) If used, the VOC spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing.

ii. Operating Requirements

- 1) Do not dispose of waste VOC or transfer it to another party in a manner that more than 20% by weight of the waste VOC can evaporate into the atmosphere. Store waste VOC only in covered containers.
- 2) Close degreaser cover whenever not handling a part in the cleaner.
- 3) Drain cleaned parts until dripping ceases (15 seconds is usually necessary).
- 4) Do not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F).

b. TAPs (Regulation 5.12)

The owner or operator shall not allow or cause the emissions of TAPs to exceed the ASL value, unless modeling or a BACT analysis has been submitted and approved by the District.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. VOC

The owner or operator shall conduct weekly inspections to verify ongoing compliance with the control and operational requirements specified in AC # 1.a.i. and 1.a.ii.

b. TAP

Compliance monitoring for the TAP emission standards shall be the record keeping requirement in AC # 3.b.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. VOC

i. The owner or operator shall maintain records that include the following for each purchase:

- 1) The name and address of the solvent supplier;
- 2) The date of the purchase;
- 3) The type of the solvent; and
- 4) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

ii. The owner or operator shall maintain records of the results of the inspection requirement specified in AC # 2.a.

b. TAP

The owner or operator shall maintain monthly records of the quantity of each solvent used including the weight % of each TAP.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. VOC/TAP

There are no compliance monitoring reports required for these pollutants.

Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

Alternative Operating Scenarios

The owner or operator did not request to operate under any alternative operating scenarios in its Title V permit application.

Off Permit Documents

There are no Off-Permit documents associated with the issuance of this operating permit.

SOURCE-WIDE HAP SPECIATION			
HAP	CAS No.	HAP	CAS No.
*Formaldehyde	50-00-0	*Vinylidene Chloride	75-35-4
*Methanol	67-56-1		

*Note: HAPs cited in the table above are those currently known to be used at this plant and were identified in the permit application.

INSIGNIFICANT ACTIVITIES		
Description	Quantity	Basis
Miscellaneous wood working operations	1	Exempt, Regulation 2.02, section 2.3.5
Brazing, soldering or other welding equipment	Various	Exempt, Regulation 2.02, section 2.3.4

- Insignificant Activities are only those activities or processes falling into the general categories defined in District Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.

2. Activities identified In District Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
 - a. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirement which shall include a 20% opacity limit for facilities not otherwise regulated.
 - b. No periodic monitoring shall be required for facilities designated as insignificant activities.